

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

CAROLINA GUZMAN, on behalf of herself
and all others similarly situated

Plaintiff

V.

I.C. SYSTEM, INC.

Defendant.

Civil Action No.: 1:20-cv-04545-ARR-
JO

**DEFENDANT’S NOTICE OF
MOTION TO DISMISS**

TO: Adam J. Fishbein
735 Central Avenue
Woodmere, New York 11598
Email: fishbeinadamj@gmail.com
Attorneys for Plaintiff

PLEASE TAKE NOTICE that at a date and time to be determined by the Court, the undersigned, attorneys for Defendant I.C. System, Inc. (“Defendant”) will move before the United States District Court for the Eastern District of New York, located at 225 Cadman Plaza East Brooklyn, New York 11201 before Honorable Allyne R. Ross, United States District Judge, for an Order granting Defendant’s Motion to Dismiss; and

PLEASE TAKE FURTHER NOTICE that Defendant shall rely upon the enclosed Brief in Support of the Motion and Certification of Peter G. Siachos and the exhibits attached thereto.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted with this motion.

Defendant respectfully requests oral argument if opposition is timely filed.

Dated: January 5, 2021

GORDON REES SCULLY MANSUKHANI LLP

Attorneys for Defendant I.C. System, Inc.

By: /s/ Peter G. Siachos
Peter G. Siachos, Esq.

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